

J. Morgan Philpot (Oregon Bar No. 144811)
morgan@jmphilpot.com
JM PHILPOT LAW, PLLC
620 E. 100 N.
Alpine, UT 84004
(801) 891-4499
Attorney / Lead Counsel for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

D. JEANETTE FINICUM, et al.,

Case No. 2:18-CV-00160-SU

Plaintiffs,

v.

MOTION FOR ENTRY OF DEFAULT
CERTIFICATES

UNITED STATES OF AMERICA, et al.,

Defendants.

Pursuant to Rule 55 of the Federal Rules of Civil Procedure, Plaintiffs, by and through undersigned counsel, move this Court for entry of a default certificate against the following defendants:

1. Federal Bureau of Investigation; *see* Doc. No. 30.
2. Bureau of Land Management; *see* Doc. No. 31.
3. Daniel P. Love; *see* Doc. No 32.
4. Salvatore Lauro; *see* Doc. No. 34.
5. W. Joseph Astarita, *see* Doc. 28.
6. Harry M. Reid, *see* Doc. 35.
7. Ronald L. Wyden, *see* Doc. 36.

for their failure to answer Plaintiff's Summons and Complaint filed herein within the time allowed by law. These seven defendants were each duly served with process of the Summons

and Complaint within the time required by the Federal Rules of Civil Procedure, including where necessary as such the time was extended by the court. The time allowed by statute and rule, to answer or otherwise defend has elapsed for each of these defendants. None of the above seven defendants have appeared or made any notice of an intent to defend.

Plaintiffs make this motion in reliance upon the points set forth in the docket entries specified above, and the Report of Service filed by Plaintiffs to which no response or objection has been made by any defendant. *See* Doc. No. 51.

Dated: August 29, 2018

/s/ J. Morgan Philpot
J. Morgan Philpot, OSB #144811
Attorney for Plaintiffs

Certificate of Service

I further certify, that on the above date, this document was also served via electronic service (Pacer/ECF) on the persons listed below, for the parties described, as follows:

James S. Smith
Department of Justice Trial Division
100 SW Market St
Portland, OR 97201
Email: james.s.smith@doj.state.or.us

Thomas F. Armosino
Frohnmayr Deatherage, et al.
2592 E. Barnett Road
Medford, OR 97501
Email: armosino@fdfirm.com

Molly R. Silver
Frohnmayr, Deatherage, Jamieson, Moore, Armosino & McGovern
2592 East Barnett Road
Larson Creek Professional Center
Medford, OR 97504
Email: silver@fdfirm.com

Amy R. Atwood
Center for Biological Diversity
PO Box 11374
Portland, OR 97211
Email: atwood@biologicaldiversity.org

Kenneth J. Abere, Jr.
Lewis Brisbois Bisgaard & Smith LLP
900 Pioneer Tower
888 SW Fifth Avenue
Portland, OR 97204
971-712-2800
Fax: 971-712-2801
Email: ken.abere@lewisbrisbois.com

David C. Campbell
Lewis Brisbois Bisgaard & Smith LLP
888 SW Fifth Avenue Suite 900
Portland, OR 97204-2025
971-712-2800
Fax: 971-712-2801
Email: david.campbell@lewisbrisbois.com

Leah Brownlee Taylor
United States Department of Justice Trial Attorney
PO Box 7146
Washington, D.C. 20044
Leah.B.Taylor@usdoj.gov

/s/ J. Morgan Philpot
J. Morgan Philpot, OSB #144811
Attorney for Plaintiffs